217/782-2113

CONSTRUCTION PERMIT

PERMITTEE

R.R. Donnelley & Sons Company
Attn: Vicki Howell
U.S. Route 45 North
Mattoon, Illinois 61938-1668

Application No.: 04090076 I.D. No.: 029803AAA
Applicant's Designation: Date Received: September 28, 2004
Subject: Presses
Date Issued: December 17, 2004
Location: U.S. Route 45 North, Mattoon

Permit is hereby granted to the above-designated Permittee to CONSTRUCT emission source(s) and/or air pollution control equipment consisting of new heatset web offset lithographic press (MM-718), new rotogravure press (MM-735) and eight new inkjet printers, as described in the above-referenced application. This Permit is subject to standard conditions attached hereto and the following special condition(s):

1.0 Unit Specific Conditions

1.1 Unit: Heatset Web Offset Lithographic Press
Control: Tandem RTO System (Two Regenerative Thermal Oxidizers Operating in Tandem)

1.1.1 Description

The new heatset web offset presses is used to produce magazines, catalogs and other similar printed materials. The press will be controlled by an existing regenerative thermal oxidizer system.

1.1.2 List of Emission Units and Pollution Control Equipment

Units	Description	Emission Control Equipment
MM-718	Heatset Web Offset Lithographic Press	Regenerative Thermal Oxidizer System

1.1.3 Applicability Provisions and Applicable Regulations

a. The "affected press", for the purpose of these unit-specific conditions, is the press as described in Condition 1.1.1 and 1.1.2.

b. The affected press is subject to 35 IAC 214.301, which provide that no person shall cause or allow emission of sulfur dioxide into the atmosphere from any process emission unit to exceed 2000 ppm.

c. The Permittee may not cause or allow the operation of the affected press unless the fountain solution contains no more than eight 8.0 percent, by weight, of volatile organic material. [35 IAC 215.408(b)]

d. The affected press is subject to 35 IAC 212.321, which provides that, no person shall not cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, that exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321. [35 IAC 212.321(a)]

1.1.4 Non-Applicability of Regulations of Concern

a. The drying oven and the oxidizer associated with the affected press are not subject to 35 IAC 216.121, Emissions of Carbon Monoxide from Fuel Combustion Emission Units, because the drying oven and the oxidizer are not by definition fuel combustion emission units.

b. The affected press is not subject to 35 IAC 215.204(c), Coating Operations/Paper Coating, as the paper coating limitation does not apply to equipment used for both printing and paper coating. [35 IAC 215.204(c)]

c. The affected press are not subject to 35 IAC 215, Subpart K specifically 35 IAC 215.301), because the affected press comply with 35 IAC 215, Subpart P. [35 IAC 215.403]

d. The affected printing systems are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subparts A and KK, because the affected printing systems are not publication rotogravure, product or packaging rotogravure, or wide-web flexographic printing presses.

e. This permit is issued based on the project not being a major modification subject to 40 CFR 52.21, prevention of Significant Deterioration (PSD). (See Attachment A)

1.1.5 Control Requirements

a. The affected press and existing oxidizer are subject to the control requirements as identified in the source's CAAPP permit.

b. The Permittee shall follow good operating practices for the oxidizer, including periodic inspection, routine maintenance and prompt repair of defects.

1.1.6 Emission Limitations

a. i. Total volatile organic material (VOM) emissions from the affected press shall not exceed 4.72 tons/month and 28.30 tons/year. Compliance with these limits shall be determined based on the emission factors and formulas in Condition 1.1.12(b).

ii. This permit is issued based on hazardous air pollutants (HAPs) from the affected press not exceeding 10 tons/year for the single HAP and not exceeding 25 tons/year for the combinations of HAPs.

iii. Compliance with the annual limit shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

b. This permit is issued based on no emission increase from the existing presses.

1.1.7 Testing Requirements

a. Testing to determine the volatile organic material content of fountain solution, inks, cleaning materials and all coatings shall be determined by Method 24, 40 CFR 60, Appendix A., incorporated by reference in 35 IAC 215.105. Any alternate test method must be approved by the Illinois EPA, which shall consider data comparing the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternate will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternate. [35 IAC 215.409]

b. i. Any tests of volatile organic material emissions, including tests conducted to determine control device destruction efficiency, shall be conducted in accordance with the methods and procedures specified in 35 IAC 215.102. [35 IAC 215.410(a)]

ii. Upon a reasonable request by the Illinois EPA, the Permittee shall conduct emissions testing for the thermal oxidizer system, at his own expense. [35 IAC 215.410(b)]

iii. The Permittee shall notify the Illinois EPA of an intent to test not less than 30 days before the planned initiation of the test so the Illinois EPA may observe the test. [35 IAC 215.410(c)]

1.1.8 Monitoring Requirements

The oxidizers shall be equipped with continuous monitoring devices which are installed, calibrated, operated and maintained according to vendor specifications at all times the oxidizers are in use. The monitoring devices shall monitor the combustion chamber temperature of each oxidizer.

1.1.9 Recordkeeping Requirements

The Permittee shall maintain monthly records of the following items for the affected press subject to limitation in Condition 1.1.6(a) to demonstrate compliance with applicable requirements in Conditions 1.1.3, and 1.1.6:

a. Records of weight of ink used (amount supplied to press minus amount discarded or recycled) (pounds);

b. Weight percent VOM in ink (wt. %);

c. Volume of fountain solution additive used (amount supplied to press minus amount discarded or recycled) (gallons);

d. Pounds VOM per gallon of fountain solution additive (pounds/gallon);

e. Volume of manual cleaning solvent used (amount supplied to press minus amount discarded or recycled) (gallons);

f. Pounds VOM per gallon of manual cleaning solvent (pounds/gallon);

g. Volume of automatic cleaning solvent used (amount supplied to press minus amount discarded or recycled) (gallons);

h. Pounds VOM per gallon of automatic cleaning solvent (pounds/gallon); and

i. The aggregate monthly and annual VOM emissions from the affected press (tons/month and tons/year).

1.1.10 Reporting Requirements

a. The Permittee shall notify the Illinois EPA, Compliance Section within 30 days of noncompliance of an affected press with the permit requirements. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

b. Two copies of required reports and notifications concerning equipment operation or repairs, performance testing or a continuous monitoring system shall be sent to:

Illinois Environmental Protection Agency
Division of Air Pollution Control
Compliance Section (#40)
P.O. Box 19276
Springfield, Illinois 62794-9276

and one (1) copy shall be sent to the Illinois EPA's regional office at the following address unless otherwise indicated:

Illinois Environmental Protection Agency
Division of Air Pollution Control
2009 Mall Street
Collinsville, Illinois 62234

1.1.11 Operational Flexibility/Anticipated Operating Scenarios

None

1.1.12 Compliance Procedures

a. Compliance with Condition 1.1.3(b) is assumed to be achieved by the work-practices inherent in operation of the natural gas/propane-fired press dryer systems for the affected press.

b. To determine compliance with Condition 1.1.6(a), emissions from the affected press shall be calculated based on the following:

Ink VOM Consumption (C_I):

$$C_I = M_I W_I / 100$$

Fountain Solution VOM Consumption (C_F):

$$C_F = V_F P_F$$

Manual Blanket Wash VOM Consumption (C_M):

$$C_M = V_M P_M$$

Automatic Blanket Wash VOM Consumption (C_A):

$$C_A = V_A P_A$$

Ink VOM Emissions (E_I):

$$E_I = C_I \ (1-R_I/100)[1-(K/100)(J_I/100)]$$

Fountain Solution VOM Emissions (E_F):

$$E_F = C_F \ [1-(K/100)(J_F/100)]$$

Automatic Cleaning Solvent VOM Emissions (E_A):

$$E_A = C_A \ [1-(K/100)(J_A/100)]$$

Manual Cleaning Solvent VOM Emissions (E_M):

$$E_M = C_M \ (1-R_M/100)$$

Total VOM Emissions (E_T):

$$E_T = E_I + E_F + E_A + E_M$$

Where:

M_I = Weight of ink used (amount supplied to press minus amount discarded or recycled) (pounds)

W_I = Weight percent VOM in ink (wt. %)

V_F = Volume of fountain solution additive used (amount supplied to press minus amount discarded or recycled) (gallons)

P_F = Pounds VOM per gallon of fountain solution additive (pounds/gallon)

V_M = Volume of manual cleaning solvent used (amount supplied to press minus amount discarded or recycled) (gallons)

P_M = Pounds VOM per gallon of manual cleaning solvent (pounds/gallon)

V_A = Volume of automatic cleaning solvent used (amount supplied to press minus amount discarded or recycled) (gallons)

P_A = Pounds VOM per gallon of automatic cleaning solvent (pounds/gallon)

C_I = Ink VOM Consumption (pounds)

C_F = Fountain Solution VOM Consumption (pounds)

C_A = Automatic Cleaning Solvent VOM Consumption (pounds)

C_M = Manual Cleaning Solvent VOM Consumption (pounds)

R_I = Percent of Ink VOM Retained In Printed Product (20%)

R_M = Percent of Manual Cleaning Solvent VOM retained in wipers (50%)

K = Control efficiency of oxidizers (97%)

J_I = Capture Efficiency Of Dryer and Control System For Ink VOM (100%)

J_F = Capture Efficiency Of Dryer and Control System For Fountain Solution (70%)

J_A = Capture Efficiency Of Dryer and Control System For Automatic Cleaning Solvent VOM (40%)

c. Emissions from the press dryer on the affected press shall be calculated based on the following emission factors:

i. Natural Gas Firing:

Pollutant	Emission Factor (lb/mmscf)
CO	84
NO_x	100
PM	7.6
SO_2	0.6
VOM	5.5

ii. Propane Firing:

Pollutant	Emission Factor (lb/1000 gal)
CO	1.9
NO_x	14
PM	0.4
SO_2	0.10S
VOM	0.5

These are the emission factors for natural gas and propane combustion, Tables 1.4-1, 1.4-2, and 1.5-1, AP-42, Volume I, Fifth Edition.

Press Dryer System Emissions (lb) = (Fuel Consumed or Firing Rate) x (The Appropriate Emission Factor)

Thermal Oxidizer (lb) = (Fuel Consumed or Firing Rate) x (The Appropriate Emission Factor)

1.2 Unit: Rotogravure Press (MR-735)
Control: Solvent Recovery System

1.2.1 Description

This new rotogravure press is used to print magazines and other similar printed materials. The new rotogravure press (MR-735) will be controlled by an existing carbon solvent recovery system.

1.2.2 List of Emission Units and Pollution Control Equipment

Units	Description	Emission Control Equipment
MR-735	Rotogravure Press	Solvent Recovery System Existing

1.2.3 Applicability Provisions and Applicable Regulations

a. The "affected press" for the purpose of these unit-specific conditions is the new rotogravure press (MR-735) as described in Condition 1.2.1 and 1.2.2.

b. The affected press is subject to 35 IAC 212.321, which provides that, no person shall not cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, that exceeds the allowable emission rates specified in subsection (c) of 35 IAC 212.321. [35 IAC 212.321(a)]

c. The affected press is subject to the New Source Performance Standard (NSPS) for publication rotogravure printing, 40 CFR 60, Subpart QQ.

Pursuant to the NSPS, 40 CFR 60.432, the Permittee shall not cause to be discharged into the atmosphere from any affected press VOM equal to more than 16 percent of the total mass of VOM solvent and water used at that facility during any one performance averaging period. The water used includes only that water contained in the waterborne raw inks and related coatings and the water added for dilution with waterborne ink systems.

Note: This permit does address compliance with 35 IAC 215 Subpart P: Printing and Publishing. This shield is based on the Illinois EPA's finding that compliance with the NSPS assures compliance with 35 IAC 215 Subpart P, following the review of the requirements of the NSPS that shows more stringent that 35 IAC 215 Subpart P.

d. The affected press is part of the affected source subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subparts KK, because the affected press is located at a major source of hazardous air pollutants (HAPs). [40 CFR 63.820 (a)(1)]

1.2.4 Non-Applicability of Regulations of Concern

This permit is issued based on the project not being a major modification subject to 40 CFR 52.21, prevention of Significant Deterioration (PSD). (See Attachment A)

1.2.5 Control Requirements

a. At all times, the Permittee shall, to the extent practicable, maintain and operate the affected press in a manner consistent with good air pollution control practice for minimizing emissions.

b. i. The affected press shall be equipped with a Permanent Total Enclosure (PTE) that ensures 100% capture of the VOM from the ink and solvents used on the affected press;

ii. VOM emissions from the affected press and associated PTE shall be controlled by an activated carbon solvent recovery system that achieves a minimum 98% VOM removal efficiency across the carbon beds on a monthly average.

c. The Permittee shall comply with all applicable requirements in the NESHAP 40 CFR 63.824(b).

1.2.6 Emission Limitations

Total volatile organic material (VOM) emissions from the affected press shall not exceed 9.85 tons/month and 78.74 tons/year. Compliance with this limit shall be determined based on the amount of VOM contained in materials used on the press, the efficiency of the capture system pursuant to Condition 1.2.5(b)(i), and the efficiency of adsorber system for the affected press as demonstrated pursuant to Condition 1.2.8. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total). These limits become effective 180 days after initial startup of the affected press at which time the existing press MM-710*, shall be permanently shutdown.

* Existing press, which is to be removed in order to address the applicability and compliance of 40 CFR 52.21, Prevention of Significant Deterioration (PSD). These limits continue to ensure that the construction and/or modification addressed in this construction permit does not constitute a new major source or major modification pursuant to these rules. (See Attachment A)

1.2.7 Testing Requirements

a. Within 60 days after achieving the maximum production rate at which the affected press will be operated, but not later than 180 days after initial startup the Permittee shall conduct a performance test for VOM emissions in accordance with provisions in 40 CFR 60.433(a).

b. i. If the affected press is using solvent-borne ink system, the Permittee shall determine the VOM content of the raw inks and related coatings used in the affected press by the measures described in 40 CFR 60.435(a).

ii. The Permittee using solvent-borne ink system shall use the results of verification analyses by Reference Method 24A to determine compliance when discrepancies with ink manufactures' formulation data occur, as required by 40 CFR 60.435(b).

c. If the Permittee is using a waterborne ink system on the affected press the Permittee shall determine VOM and water content of raw ink and related coatings used in the affected rotogravure press as described in 40 CFR 60.435(c).

d. The Permittee shall determine the density of raw inks, related coating and VOM solvent used in the affected rotogravure press by the measures described in 40 CFR 60.435(d).

e. If compliance with the NSPS, 40 CFR 60 Subpart QQ, is determined according to 40 CFR 60.433(e), (f) or (g), all materials used on the production presses controlled by the common solvent recovery system shall be tested per the requirements of paragraphs (a) through (d).

f. Criteria for verification of a permanent or temporary total enclosure shall be based pursuant to the NESHAP 40 CFR 63.827(e)(1) or 40 CFR 63.827(e)(1) Part 51, Appendix M, Method 204.

1.2.8 Monitoring Requirements

The solvent recovery system shall be equipped with inlet and outlet analyzers to monitor the concentration of VOM in the stream entering and leaving the carbon beds.

Note: These monitors are required for operational monitoring. They may also be used for purpose of determining compliance with control efficiency requirements as an alternative to conducting liquid-liquid mass balances.

1.2.9 Recordkeeping Requirements

a. Pursuant to the NSPS 40 CFR 60.434, the Permittee shall keep records of the aggregate monthly quantity of all inks, diluent solvents, and cleaning solvents used for all production rotogravure presses, the VOM content of the materials used, and the VOM recovered from the solvent recovery system.

b. Records of aggregate monthly emissions from the production rotogravure presses shall be maintained, based on monthly materials consumption and solvent recovery system performance.

c. If credit is desired for VOM emissions from materials purchased but not consumed or from waste materials, records of materials disposed of or recycled shall be maintained for all inks and solvents on a monthly basis.

d. Records of the following deviations shall be separately maintained:

i. Instances of VOM control efficiency lower than that specified in Condition 1.2.5, established by the monitoring procedures in Condition 1.2.8 or other means.

ii. Instances of VOM emissions in excess of the limitations in Condition 1.2.3(c) or 1.2.6.

e. The Permittee shall maintain records of the following items for the affected press to demonstrate compliance with Conditions 1.2.6. These records shall be reviewed and updated as needed whenever a significant change is made in the operation and utilization of the affected press.

i. The VOM content of ink(s) used in the affected press. This information may be obtained from the ink supply serving the affected press.

ii. The monthly usage of VOM on the affected press based on the VOM content of ink as determined from the above records.

iii. The aggregate monthly and annual VOM emission of the affected press, based on its VOM usage and the level of overall VOM control achieved by the capture system and solvent recovery system.

f. The Permittee shall keep the records as required for the affected source pursuant to the NESHAP 40 CFR 63.829.

1.2.10 Reporting Requirements

a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected rotogravure press with the permit requirements as follows. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

i. Deviations from emission limits in the affected press shall be reported in 30 days.

ii. Other deviation shall be reported in a quarterly reports.

b. A summary report shall be submitted on a semi-annual basis for the affected source as required by the NESHAP 40 CFR 63.830.

1.2.11 Operational Flexibility/Anticipated Operating Scenarios

None

1.2.12 Compliance Procedures

a. Compliance with the VOM emission limit in Condition 1.2.6 for the affected press shall be calculated based on the following:

Ink VOM Consumption (C_I):

$$C_I = M_I W_I / 100$$

Diluent/Cleaning Solvent VOM Consumption (C_S):

$$C_S = V_S P_S$$

Total VOM Consumption:

$$C_T = C_I + C_S$$

Total VOM Emissions (E_I):

$$E_T = C_T [1-(K/100)(J/100)]$$

Where:

M_I = Weight of ink used (amount supplied to press minus amount discarded or recycled) (pounds)

W_I = Weight percent VOM in ink (wt. %)

V_S = Volume of diluent and cleaning solvent used (amount supplied to press minus amount discarded or recycled) (gallons)

P_S = Pounds VOM per gallon of diluent and cleaning solvent (pounds/gallon)

K = Control efficiency of carbon adsorbers system (monthly average as determined by monitoring pursuant to Condition 1.2.8)

J = Capture Efficiency Of Permanent Total Enclosure Capture System For VOM (100% as demonstrated pursuant to Condition 1.2.7(f))

1.3 Unit: Inkjet Printing Systems

1.3.1 Description

The inkjet printing systems are be used for the printing of names and addresses and other personalized information on individual magazines and catalogs.

1.3.2 List of Emission Units and Pollution Control Equipment

Emission Unit	Description	Emission Control Equipment
Printing Systems	Eight Scitex Inkjet Printers Model 7122	None

1.3.3 Applicability Provisions and Applicable Regulations

a. The "affected printing systems" for the purpose of these unit-specific conditions are the inkjet printing systems described in Conditions 1.3.1 and 1.3.2.

b. The affected printing systems are subject to 35 IAC 212.321(a), which provides that the Permittee shall not cause or allow the emission of particulate matter into the atmosphere in any one hour period from any new process emission unit, either alone or in combination with the emission of particulate matter from all other similar process emission units for which construction or modification commenced on or after April 14, 1972, at a source or premises, exceeds the allowable emission rates specified in 35 IAC 212.321(c). [35 IAC 212.321(a)]

c. The affected printing systems are subject to 35 IAC 215, Subpart G: Use of Organic Material, which provides that no person shall cause or allow the discharge of more than 3.6 kg/hr (8 lb/hr) of volatile organic material (VOM) into the atmosphere from any emission unit, except as provided in 35 IAC 215.302 and with the following exception: if no odor nuisance exists the limitation shall apply only to photochemically reactive material.

1.3.4 Non-Applicability of Regulations of Concern

a. The affected printing systems are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Printing and Publishing Industry, 40 CFR 63, Subparts A and KK, because the affected printing systems are not publication rotogravure, product or packaging rotogravure, or wide-web flexographic printing presses.

b. The affected printing systems are not subject to 35 IAC 215.204(c), Coating Operations/Paper Coating, as the paper coating limitation does not apply to equipment used for both printing and paper coating. [35 IAC 215.204(c)]

c. This permit is issued based on emissions of Hazardous Air Pollutants (HAPs) from the affected printing systems being less than 10 tons/year for a single HAP and less than 25 tons/year for all combined HAPs.

1.3.5 Operational and Production Limits and Work Practices

a. Usage of ink and replenishing fluid combined shall not exceed 1.35 tons/month and 5.40 tons/year.

1.3.6 Emission Limitations

a. Emissions of VOM from the affected printing systems at the source combined shall not exceed 1.35 tons/month and 5.40 tons/year, total.

b. This permit is issued based on negligible emissions of particulate matter. For this purpose negligible emissions shall not exceed 0.1 lb/hr and 0.44 tons/year.

c. Compliance with annual limits shall be determined on a monthly basis from the sum of the data for the current month plus the preceding 11 months (running 12 month total).

1.3.7 Testing Requirements

Upon request by the Illinois EPA, the volatile organic material content of inks and all coatings shall be determined by Method 24, 40 CFR 60, Appendix A, incorporated by reference in Section 215.105. Any alternate test method must be approved by the Illinois EPA, which shall consider data comparing the performance of the proposed alternative to the performance of the approved test method(s). If the Illinois EPA determines that such data demonstrates that the proposed alternative will achieve results equivalent to the approved test method(s), the Illinois EPA shall approve the proposed alternative. [35 IAC 215.409]

1.3.8 Monitoring Requirements

None

1.3.9 Recordkeeping Requirements

The Permittee shall maintain records of the following items for the affected printing systems to demonstrate compliance with Conditions 1.3.5 and 1.3.6:

a. Usage of ink (tons/month and tons/year);

b. Usage of replenishing fluid (tons/month and tons/year);

c. VOM content on the material used in the affected printing systems; and

d. The aggregate monthly and annual VOM emissions from the affected printing systems (tons/month and tons/year), with supporting calculations.

1.3.10 Reporting Requirements

a. The Permittee shall promptly notify the Illinois EPA, Compliance Section of noncompliance of the affected printing systems with the permit requirements as follows. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken.

i. Deviations from emission limits in Condition 1.3.6 shall be reported in 30 days.

ii. Other deviation shall be reported in a quarterly reports.

1.3.11 Operational Flexibility/Anticipated Operating Scenarios

None

1.3.12 Compliance Procedures

To determine compliance with the VOM emissions limitations in Conditions 1.3.6 from the affected printing systems emissions shall be calculated assuming all material used is emitted as VOM.

Please note that the Permittee is allowed to operate the new units under this permit until the next reissuance of the CAAPP Permit.

If you have any questions on this, please call Ricardo Ng at 217/782-2113.

Donald E. Sutton, P.E.
Manager, Permit Section
Division of Air Pollution Control

DES:RNG:jar

cc: Region 3

ATTACHMENT A

Attainment PSD Applicability for Volatile Organic Material (VOM)
(11/2004 to 11/2000)

Table I – Emissions Increases Associated With The Proposed Modification

Item of Equipment	Proposed Commencement of Operation Date	VOM Emissions Increase (Tons/Year)	Permit Number
MM-718	2004	28.30	04090076
MR-735	2004	78.74	04090076
Inkjet Printers (8)	2004	5.40	04090076

Table II – Source-Wide Creditable Contemporaneous Emission Increases

Item of Equipment	Commencement of Operation Date	VOM Emissions Increase (Tons/Year)	Permit Number
Inkjet 5-9	2004	3.40	04070007
Inkjet 1-4	2003	2.72	03050055
MM-722	2003	10.70	03020041
Boiler #7	2001	0.81	01070002
MR-736	2001	78.80	01070002

Table III – Source-Wide Creditable Contemporaneous Emission Decreases

Item of Equipment	Date of Removal	VOM Emissions Increase (Tons/Year)	Permit Number
MM-711	2000	49.20	---
MM-714	2002	69.80	---
MM-712	2003	39.60	---
MR-732	2004	48.29	---
MM-710	2005	57.20	---

Table IV – Overall Emissions Increase

	(Tons/Year)
Increases Associated With The Proposed Modification	112.44
Contemporaneous Emission Increases	96.43
Contemporaneous Emission Decrease	- 264.09
Total Net Change	- 55.22

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